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# State Water Resources Control Board

## Executive Office

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Gray Davis  
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APR 28 1999

TO: Lester A. Snow  
Executive Director  
CALFED BAY-DELTA PROGRAM

FROM:   
Walt Pettit  
Executive Director  
EXECUTIVE OFFICE

DATE: APR 22 1999

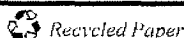
SUBJECT: COMMENTS ON THE DRAFT CALFED PROGRAMMATIC DECISION

At the April 15, 1999, Policy Group Meeting you requested comments on the above-referenced document by April 23, 1999. Below are State Water Resources Control Board's (SWRCB) comments:

### I. Water Quality Program (page 4)

- Pesticides are listed as two bullets: one as pesticides and another one as organochlorine pesticides. Since the actions are essentially the same for both, I suggest that you re-title the bullet to be pesticides (including organochlorine pesticides) and delete the second bullet.
- The trace metal discussion appears to focus on copper. Copper has not been found to be a significant water quality problem from urban and agricultural discharges in the Delta and upstream. This is an issue in the Bay portion of the Estuary. The better trace element to use in this section would be mercury, or focus on the Bay.
- Change the wording in the bullet on mercury to "reduce the bio-available mercury levels..." Also, add "CALFED will pursue the adoption of Federal Good Samaritan legislation to enable the State agencies to conduct remediation at abandoned mine sites."
- The bullet on salinity should include the following in the first sentence: "Reduce salt sources in urban and industrial wastewater and reduce, re-route and/or reschedule salt loading from agricultural and wetland sources to protect..." Also, the last sentence in this bullet suggests that the water projects will increase Delta outflow to improve salinity conditions. Given the impact that such actions have on water supply, it is unlikely that Delta operations will provide

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more water for salinity protection above the current Delta standards. I suggest the phrase "storage capability to maintain Delta outflow and to adjust the timing of outflow, and" be deleted.

- Turbidity is listed as adversely affecting the Bay Delta and its tributaries. This bullet should focus on sediment discharges in the tributary areas. The major source of turbidity issues in the Bay/Delta are dredging activities that are regulated by the Regional Board. CALFED should focus on the non-point issues in the upstream tributaries that adversely affect fishery resources. These discharges are much more difficult to control.

## II. Transfers (pages 6 and 7)

- The first bullet on page 7 discusses "streamlining" the approval process. It includes the phrase "clarifying and disclosing current approval procedures." The term disclosing connotes that these approval processes are somehow secretive. I suggest that the word "disclosing" be deleted. The transfer approval processes are well known. However, the application of existing State law to both short-term and long-term transfers needs more clarification and more definition.
- In the second bullet, the terms "quantification guidelines and quantification criteria" are used. These terms are not defined and are not a terms most readers will understand. I suggest you use the phrase "the methods to quantify consumptive use and conserved water."

Thank you for giving SWRCB an opportunity to comment on this important document. Should you have any questions regarding these comments, please contact me at the above-referenced number.

cc: Gary M. Carlton  
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Gerald E. Johns  
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